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Attorneys for Plaintiffs
SPORTS SHINKO CO., LTD., and
SPORTS SHINKO (USA) CO., LTD.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

SPORTS SHINKO CO., LTD.,

Plaintiff,

vs.

QK HOTEL, LLC, a Hawai'i
limited liability company, et al.,

Defendants.

SPORTS SHINKO (USA) CO.,
LTD., a Delaware corporation,

Plaintiff,

CIVIL NO. CV 04-00124

ACK/BMK

**PLAINTIFF SPORTS SHINKO
CO., LTD.'S RESPONSE TO
DEFENDANT KG HOLDINGS,
LLC'S REQUEST FOR
PRODUCTION OF
DOCUMENTS TO PLAINTIFF
SPORTS SHINKO CO., LTD.**

Consolidated Case

CIVIL NO. CV 04-00125

ACK/BMK

EXHIBIT 4

4. Plaintiff further objects to the Requests as to the production and copying of the produced documents at the offices of Price, Okamoto, Himeno & Lum. All non-privileged and responsive documents will be produced for inspection and copying at the offices of ALSTON HUNT FLOYD & ING, Suite 1800, American Savings Bank Tower, 1001 Bishop Street, Honolulu, Hawaii 96813 on a mutually agreeable date and time.

5. Plaintiff hereby incorporates these General Objections by reference into each and every demand set forth in the Requests.

Without waiving the foregoing objections, Plaintiff responds to each of the Requests as follows:

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. *Produce all Documents Relating To the transfer of loans from SS-J to South Wind Realty Finance (Cayman) Company LLC, as alleged in ¶ 7 of the Second Amended Complaints filed in D. Hawaii CV No. 04-124 and CV 04-127.*

Objection: Overly broad. Seeks privileged information, attorney work product, and sensitive, confidential financial information. This request is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, Plaintiffs respond as follows:

RESPONSE:

Plaintiffs have disclosed and/or will produce non-privileged documents responsive to this request, if any exist, subject to their objections and the Stipulated Protective Order.

2. *Produce all Documents Relating To the acquisition of the capital stock of SS-J by South Wind Realty Finance (Cayman) Company LLC.*

Objection: Overly broad. Seeks privileged information, attorney work product, and sensitive, confidential financial information. This request is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, Plaintiffs respond as follows:

RESPONSE:

Plaintiffs have disclosed and/or will produce non-privileged documents responsive to this request, if any exist, subject to their objections and the Stipulated Protective Order.

3. *Produce all Documents Relating To the allegations in Count 3 of the Second Amended Complaints (¶¶ 57-62) filed in D. Hawaii CV No. 04-124 and CV 04-127.*

Objection: Seeks privileged information, attorney work product, and sensitive, confidential information. Seeks information that is in the possession or control of Defendants. This request is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, Plaintiffs respond as follows:


5. *Produce all Documents Relating To the claim for punitive damages in ¶¶ 98-100 in the Second Amended Complaints filed in D. Hawaii CV No. 04-124 and CV 04-127.*

Objection: Seeks privileged information, attorney work product, and sensitive, confidential information. Seeks information that is in the possession or control of Defendants. This request is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, Plaintiffs respond as follows:

RESPONSE:

Plaintiffs have disclosed and/or will produce non-privileged documents responsive to this request, if any exist, subject to their objections and the Stipulated Protective Order.

DATED: Honolulu, Hawai'i, November 1, 2005.


PAUL ALSTON
GLENN T. MELCHINGER
Attorneys for Plaintiffs